Virginia R. Richard, Esq. (VR 6294) Lana C. Marina, Esq. (LM 1667) WINSTON & STRAWN LLP 200 Park Avenue New York, New York 10166 (212) 294-6700

Attorneys for Plaintiff UNITED LINENS CORP.

06 CV

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JUDGE SAND

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED LINENS CORP., a New York corporation,

Plaintiff,

v.

TEXTILES FROM EUROPE, INC., d/b/a VICTORIA CLASSICS, a New York corporation,

Defendant.



Civil Action No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff United Linens Corp. ("United Linens"), for its Complaint against Defendant Textiles From Europe, Inc., d/b/a Victoria Classics ("Victoria Classics"), alleges:

PARTIES

Plaintiff United Linens is a corporation organized and existing under the laws of New York, having its principal place of business at 350 Fifth Avenue, Suite 1229, New York, New York 10118.

2. Upon information and belief, Defendant Victoria Classics is a corporation organized and existing under the laws of New York, having its principal place of business at 277 Fifth Avenue, New York, New York 10016.

JURISDICTION AND VENUE

- 3. This is an action for copyright infringement in violation of the Copyright Law [17 U.S.C. §§ 501 et seq.], all of which activities have occurred in this district and elsewhere in commerce.
- 4. This action results from Defendant's unlawful manufacture, distribution and sale of products which infringe Plaintiff's U.S. Copyright Reg. No. VA 1-325-130 (the "Copyrighted Design") and VA 1-325-156 (the "Copyrighted Product Insert").
- 5. This court has jurisdiction pursuant to Section 501 of Title 17 of the United States Code, and Sections 1331 and 1338(a) of Title 28 of the United States Code.
- 6. Venue is founded on Sections 1391(b) and (c) and 1400(a) of Title 28 of the United States Code.

FACTUAL BACKGROUND

A. UNITED LINENS' DESIGN, PROMOTION AND SALE OF ITS COPYRIGHTED DESIGN

7. United is one of the leading designers and manufacturers of bedding, comforter sets and decorative accessory products in the United States.

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- 8. United's products bearing the Copyrighted Design and Copyrighted Product Insert are sold in high-end department stores and specialty shops throughout this District and elsewhere in the United States.
- 9. United is the exclusive owner in the United States of the copyright in the fabric design known as United Linens Design #1, which is the subject of U.S. Copyright Registration No. VA-1-325-130 registered on November 25, 2005 ("Copyrighted Design") and U.S. Copyright Registration No. VA-1-325-156 registered on November 28, 2005 which is the Copyrighted Product Insert sheet showing a photograph of the Copyrighted Design. The registration of the Copyrighted Design and Copyrighted Product Insert creates a legal presumption in favor of United with respect to the ownership of and the validity of the copyrights in these works. True and correct copies of the certificates of registration and related deposits for the Copyrighted Design and Copyrighted Product Insert are attached as Exhibits 1 and 2.

B. DEFENDANT'S INFRINGING ACTS

10. On or about December 2005, United acquired a comforter set comprised of a comforter, pillow shams and bed skirt manufactured by defendant, Victoria Classics which bears the Copyrighted Design ("Infringing Product") and is packaged with a product insert bearing a picture of the Infringing Product ("Infringing Product Insert"). Photographs of the Infringing Product and Infringing Product Insert are attached as Exhibit 3.

- 11. The Infringing Product packaged with the Infringing Product Insert bears the name "Victoria Classics" on the labels affixed to the Infringing Product and on the Infringing Product Insert.
- 12. On or about January 5, 2006, United sent a cease and desist letter to Victoria Classics demanding a response by January 12, 2006. A copy of the cease and desist letter is attached as Exhibit 4. To date no response has been received to the cease and desist letter.
- 13. On information and belief, Victoria Classics has sold the Infringing Product packaged with the Infringing Product Insert to department stores and specialty shops in this district and throughout the United States.
- 14. On information and belief, Victoria Classics has willfully and/or negligently infringed the Copyrighted Design and Copyrighted Product Insert by manufacturing, distributing, advertising, selling and/or offering for sale infringing products and package inserts bearing the Copyrighted Design and photographs of the Copyrighted Design without United's authorization. United has neither licensed nor authorized Victoria Classics to reproduce, adapt and/or display the Copyrighted Design or Copyrighted Product Insert or to manufacture, distribute, advertise, sell or offer for sale the Infringing Product or the Infringing Product Insert.
- 15. On information and belief, despite being put on notice by United of the infringing nature of the Victoria Classics product and product insert, Victoria Classics willfully continues to

manufacture, distribute, sell and offer to sell the Infringing Product with the Infringing Product Insert.

- 16. The infringing conduct of Defendant was and is willfully done with knowledge of, and/or reckless disregard for, United's rights in the Copyrighted Design and Copyrighted Product Insert and for the purpose of damaging United's business and profiting from the unauthorized manufacture, use and sale of products bearing the Copyrighted Design and Copyrighted Product Insert.
- 17. At all relevant times, United has owned all right, title and interest in and to the copyrights in the Copyrighted Design and Copyrighted Product Insert.
- 18. United has complied in all respects with Title 17 of the United States Code, secured the exclusive rights and privileges to the Copyrighted Design and Copyrighted Product Insert as well as obtained the appropriate certificates of copyright registration which constitute prima facie evidence of the validity of the copyright and the facts stated in the certificates.
- 19. After the date of the filing for registration of the Copyrighted Design and Copyrighted Product Insert and continuing to date, Victoria Classics has infringed the copyrights in the Copyrighted Design and Copyrighted Product Insert.
- 20. United has no adequate remedy at law. Victoria Classic's conduct as described above has caused and, if not enjoined, will continue to cause irreparable harm to United.

JURY DEMAND

Plaintiff hereby demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, United prays for the following relief against Victoria Classics:

- 1. That Victoria Classics, and its agents, servants, employees, representatives, successors and assigns, and all persons, firms, or corporations in active concert or participation with any of them, be immediately and permanently enjoined from directly or indirectly infringing United's Copyrighted Design and Copyrighted Product Insert in any manner, including generally, but not limited to reproducing, adapting, and/or displaying the Copyrighted Design and Copyrighted Product Insert by manufacturing, distributing, advertising, selling, and/or offering for sale any merchandise that infringes said Copyrighted Design and Copyrighted Product Insert, and specifically:
- (a) Manufacturing, distributing, selling, and/or offering for sale said products or any other unauthorized products that picture, reproduce, adapt or display any design that bears a substantially similarity to United's Copyrighted Design or Copyrighted Product Insert; or
- (b) Manufacturing, distributing, selling, or offering for sale any unauthorized promotional materials, labels, packaging, or containers that picture, reproduce, adapt, or display any design that bears a substantial similarity to United's Copyrighted Design or Copyrighted Product Insert;
- 2. That Victoria Classics, and its agents, servants, employees, representatives, successors and assigns, and all persons, firms, or corporations in active concert or participation

with any of them, be enjoined during the pendency of this action from destroying or otherwise disposing of:

- (a) Any merchandise that pictures, reproduces, copies, adapts, or displays designs that bear a substantial similarity to United's Copyrighted Design or Copyrighted Product Insert:
- (b) Any promotional and advertising material, labels, packages, wrappers, containers, and any other unauthorized items that reproduce, copy, adapt, or display designs that bear a substantial similarity to United's Copyrighted Design or Copyrighted Product Insert;
- (c) Any molds, screens, patterns, plates, or negatives used specifically for making or manufacturing products with designs that picture, reproduce, copy, or bear a substantial similarity to United's Copyrighted Design or Copyrighted Product Insert; and
- (d) Any sales and supplier or customer journals, ledgers, invoices, purchase orders, inventory control documents, bank records, catalogues, recordings of any type whatsoever, and all other business records and documents in respect of the manufacture, purchase, advertising, sale, or offering for sale of the Infringing Product or Infringing Product Insert;
- 3. That Victoria Classics be required to effectuate the recall, removal, and return from commercial distribution and/or public display of:
- (a) Any merchandise that pictures, reproduces, copies, adapts, or displays designs that bear a substantial similarity to United's Copyrighted Design or Copyrighted Product Insert;

- (b) Any promotional and advertising material, labels, packages, wrappers, containers, and any other unauthorized items that reproduce, copy, adapt, or display designs that bear a substantial similarity to United's Copyrighted Design or Copyrighted Product Insert; and
- (c) Any molds, screens, patterns, plates, or negatives used specifically for making or manufacturing products with designs that picture, reproduce, copy, or bear a substantial similarity to United's Copyrighted Design or Copyrighted Product Insert;
- 4. That Victoria Classics be required to pay actual damages increased to the maximum extent provided by law, and/or statutory damages at United's election;
- 5. That Victoria Classics account for and pay over to United all damages sustained by United and profits realized by Victoria Classics by reason of Victoria Classics' unlawful acts herein alleged and that those profits be increased as provided by law;
- 6. That Victoria Classics hold, as a constructive trustee for the benefit of United, any and all personal and/or real properties and assets consisting of and/or obtained by profits derived from Victoria Classics' infringing activities, and that United be granted possession of these properties;
- 7. That United recover from Victoria Classics its costs in this action and reasonable attorneys' fees;

- 8. That United recover from Victoria Classics compensatory damages in an amount to be determined at trial; and
- 9. That United have all other and further relief as the Court may deem just and proper under the circumstances.

Dated: January 19, 2006

By:

Virginia R. Richard (VR 6294) Lana C. Marina (LM 1667)

WINSTON & STRAWN LLP

200 Park Avenue

New York, New York 10166

Telephone: (212) 294-6700 Facsimile: (212) 294-4700

Attorneys for Plaintiff UNITED LINENS CORP.

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Register of Copyrights, United States of America

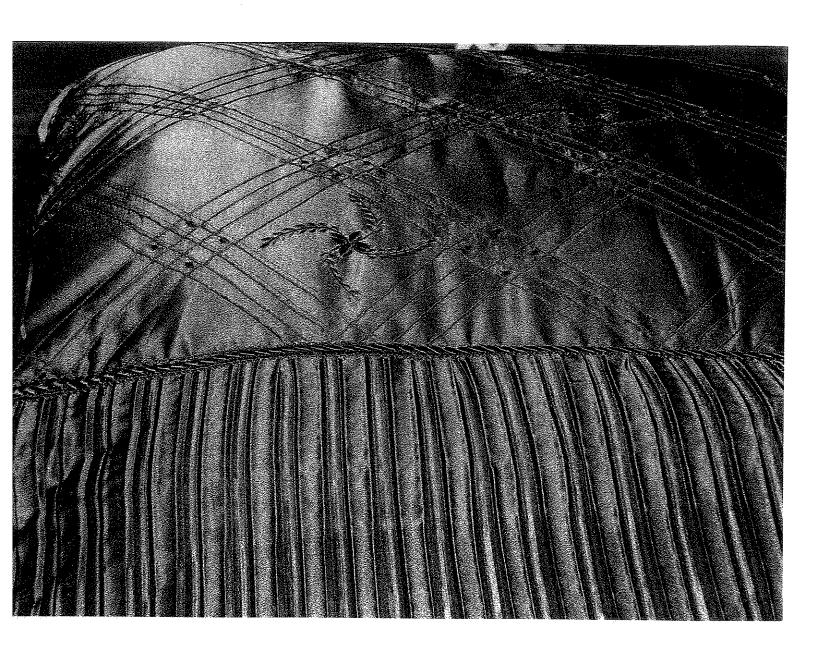
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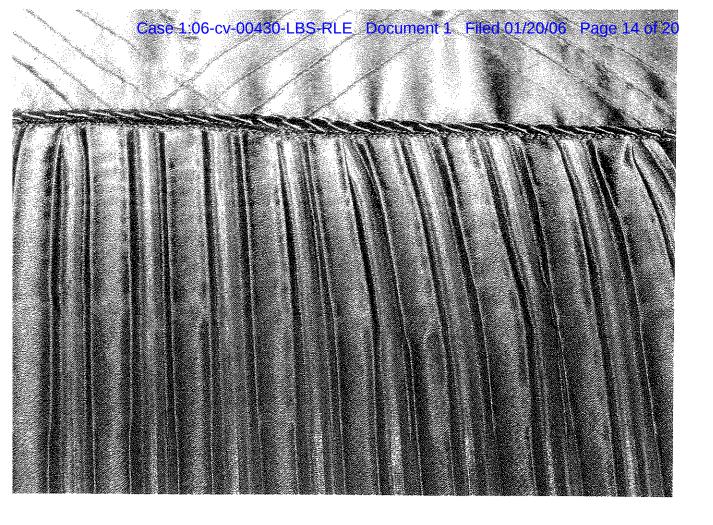
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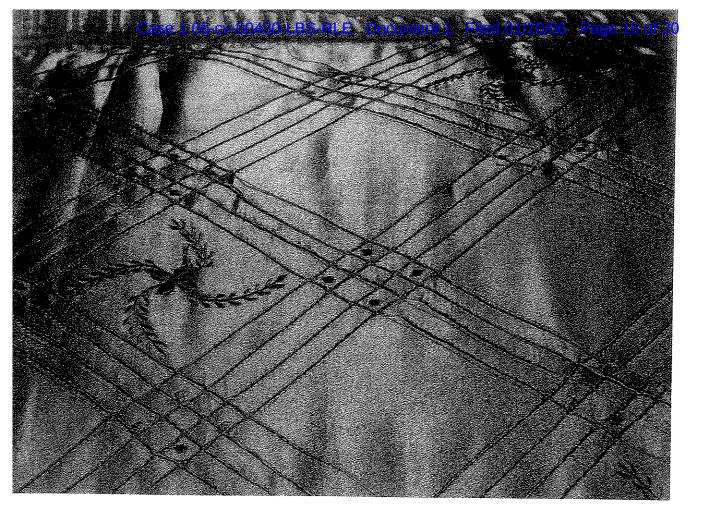
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*17 U.S.C. § 505(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written externent filed in connection with the application, shall be lined not more than \$2,500.

- □ OVER SIZE 11 PCS COMFORTER SET INCLUDE
- OVER SIZE 7 PCS COMFORTER SET INCLUDE
- M OVER SIZE 4 PCS COMFORTER SET INCLUDE
- 4PC COMFORTER SET COMFORTER SHAMS(2)

BED SKIRT CONTENT:100% POLYESTER

- ☐ 4PC FLAT SHEET SET
 FITTED SHEET
 FLAT SHEET
 PILLOWCAES(2)
 CONTENT:100% COTTON,200 THREAD COUNT
- SPC PILLOW SET
 SQUARE PILLOW
 BOUDOIR PILLOW
 NECKROLL PILLOW
 CONTENT:100% POLYESTER

COMFORTER

Quality thread counts for soft sheets.

EASE

Larger sized sheets wrap aroud mattresses up to 15"deep.

LUXURY

Oversized and overfiled comforter.

STYLE

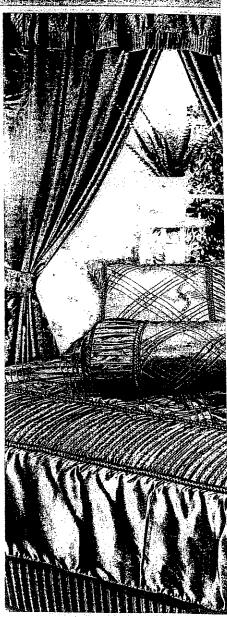
Bedding ensembles for a comforter bedroom décor.

☐ FULL SIZE

QUEEN SIZE

☐ KING SIZE





WASHING INSTRUCTION: Dry Clean Only RN#115554